Application No.: 10/665,289 Docket No.: 21806-00056-US1

REMARKS

Claims 29-37 remain pending in this application. Claims 29 and 34 are independent. Claims 29 and 34 have been amended, and no claims have been added or canceled by this amendment.

Unpatentability Rejection over Peaslee in View of Dye

Withdrawal of the rejection of claims 29-37 under 35 U.S.C. §103(a) as being unpatentable over Peaslee (US 5,276,798) in view of Dye (US 5,706,478) is requested.

At the outset, Applicant notes that, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, ***the prior art reference must teach or suggest all the claim limitations***.[1] Further, the teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, not in applicant's disclosure.[2]

As claimed, Applicants' invention utilizes a stored executable program in the subsystem (not just a command list which must be interpreted). The stored executable program is generated from hardware instructions provided by the host system.

In particular, the applied art, taken alone or in combination, does not teach or suggest a method for offloading hardware interrupt processing from a host system to a subsystem which includes, among other features, "...capturing, in a subsystem memory, hardware instructions generated by high-level specifications of operations in a computer program; generating an executable program from the captured hardware instructions and storing the executable program in the subsystem memory; [and] utilizing a subsystem processor to execute the executable program with subsystem hardware without hardware interrupt processing by the host system...", as recited in independent claim 29, as amended.

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[1] *See* MPEP §2143.
[2] *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991) and *See* MPEP §2143.

Further, the applied art, taken alone or in combination, does not teach or suggest a computer system suitable for graphics rendering wherein, among other features, "...said graphics subsystem receives the hardware instructions provided by the host system...said graphics subsystem uses the hardware instructions to generate an executable program that is stored in a subsystem memory, and...hardware interrupt generation and handling is accomplished by the graphics subsystem and not by the CPU", as recited in independent claim 34, as amended.

Accordingly, since the combination of applied art does not teach or suggest all the claimed limitations, withdrawal of the rejections and allowance of claims 29-37 are respectfully requested.

Conclusion

In view of the above amendments and remarks, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

In the event the Examiner believes that an interview would be helpful in resolving any outstanding issues in this case, the undersigned attorney is available at the telephone number indicated below.

Applicant believes no fee is due with this response. However, if a fee is due, please charge CBLH Deposit Account No. 09-0456, under Order No. 21806-00056-US1 from which the undersigned is authorized to draw.

Respectfully submitted,

By _____

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